

**IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: ALEXANDER SEAWRIGHT TRANSPORTATION, LLC CHAPTER 11  
Debtor CASE NO. 19-00217-NPO**

**MOTION TO STRIKE**

COMES NOW Alexander Seawright Transportation, LLC (the “Debtor”), and the Law Offices of Craig M. Geno, PLLC (the “Movant”), and move to strike the Amended Response filed herein by Hayles Towing & Recovery [DK #56], and in support thereof, would respectfully show as follows, to-wit:

1. Respondent Hayles Towing & Recovery has filed an amended response to its original response without leave of Court. Accordingly, the amended response should be stricken pending an appropriate motion and order authorizing the amendment to the original response.
2. Further, the demand for sanctions against the Law Offices of Craig M. Geno, PLLC, should be stricken for failure to comply with the Bankruptcy Rules in that the demand is premature, procedurally.
3. Other grounds to be assigned up on a hearing hereof.

WHEREFORE, PREMISES CONSIDERED, Debtor and the Law Offices of Craig M. Geno, PLLC move the Court for an order striking the amended response. Debtor prays for general relief.

This, the 22d day of February, 2019.

Respectfully submitted,

ALEXANDER SEAWRIGHT TRANSPORTATION, LLC

By Its Attorneys,

LAW OFFICES OF CRAIG M. GENO, PLLC

By: Craig M. Geno  
Craig M. Geno

OF COUNSEL:

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**CERTIFICATE OF SERVICE**

I, Craig M. Geno, do hereby certify that I have caused to be served this date, via electronic filing transmission, a true and correct copy of the above and foregoing to the following:

Ronald H. McAlpin, Esq.  
Office of the United States Trustee  
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Charlene M. Williams, Esq.  
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THIS, the 220 day of February, 2019.

  
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Craig M. Geno